UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

9384-2557 QUÉBEC INC., a Canadian corporation; MINEDMAP, INC., a Nevada corporation; and SERENITY ALPHA, LLC, a Nevada limited liability, and other similarly situated individuals,

Plaintiffs,

-against-

NORTHWAY MINING, LLC, a New York limited liability company; MICHAEL MARANDA, an individual; MICHAEL CARTER, an individual; CSX4236 MOTORCYCLE SALVAGE, LLC, a New York limited liability company; DROR SVORAI, an individual; MINING POWER GROUP, INC., a Florida corporation; HUDSON DATA CENTER, INC, a New York Corporation, MICHAEL MARANDA, LLC, a New York Limited liability company; PORTER KING HILL CONTRACTING, LLC, COINMINT, LLC, a Delaware limited liability company,

AFFIDAVIT	<u>OF</u>	MICHAEL
CARTER		

In Opposition to Motion for Prejudgment Attachment

Civ. Action No.: 1:19-CV-00501-TJM-CFH

Defendants.

STATE OF NEW YORK)
)s.s.:
COUNTY OF)

MICHAEL CARTER, being duly sworn deposes and says under penalty of perjury the following:

- 1. I am one of the defendants in the above-captioned case. I understand that the plaintiffs have filed a motion for pre-judgment attachment fees and costs against me and defendant Michael Maranda. I submit this affidavit in opposition to that motion. This affidavit is based upon my personal knowledge.
- 2. I have read the "Motion for Prejudgment Attachment" signed by the plaintiffs' attorney, T. Edward Williams. He alleges that I have transferred or am transferring "bitcoins, cash, cars, and other assets into the name of nonparties to this proceeding, including [Melissa Welsh]."

He also alleges that "Defendants also continues [sic] to transfer assets out of bank accounts at M&T Bank and Teacher's Federal Credit Union."

3. I do not know what Mr. Williams is talking about. I have not and am not transferring property to non-parties during this action (including Ms. Welsh), and have not disposed of any property to avoid creditors (or the plaintiffs). I pay bills like anyone else, but I am not disposing of property. I also do not have accounts at M&T Bank or Teacher's Federal Credit Union. I also do not have signing authority on any of the other defendants' bank accounts. Also, contrary to Mr. Williams' allegations, I am not "hiding" any money or property. I respectfully submit that the plaintiffs' motion should be denied.

Michael Carter

Sworn to before me this

day of August, 2020

Notary Public

CATHY L. DROBNY
Notary Public, State of New York
No. 01DR5051077
Qualified in Saratoga County,

Commission Expires 10/23/